



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

South Kesteven District Council

**Annual Position Statement 2022**  
**Statement of Engagement**

Appendix 2: Annual Position Statement Representations



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

| <b>Annual Position Statement Representation Comment Index</b> |                          |  |  |   |
|---|--------------------------|--|--|---|
| <b>Representation Reference</b>                               | <b>Comment Reference</b> | <b>Name/Organisation</b>   | <b>Draft APS Section/Paragraph</b>   | <b>APS Site Reference Code and Name</b>                               |
| SKR.APS.2201  | ACR221                   | Canal & River Trust – Hazel Smith  | General  |   |
| SKR.APS.2202  | ACR222                   | Stephen Short – Escritt Barrell Golding on behalf of The Jenkinson Family          | Housing Supply Table 5   | APS048 – GR3-H2 Rectory Farm (Phase 2 North West Quadrant, Grantham). |
| SKR.APS.2203  | ACR224                   | Historic England – Emilie Carr   | General  |   |
| SKR.APS.2204  | ACR225                   | Paul Hill – RPS Consulting Services Ltd on behalf of Persimmon Homes East Midlands | Table 3  |   |
| SKR.APS.2204  | ACR226                   | Paul Hill – RPS Consulting Services Ltd on behalf of Persimmon Homes East Midlands | Table 4  |   |
| SKR.APS.2204  | ACR227                   | Paul Hill – RPS Consulting Services Ltd on behalf of Persimmon Homes East Midlands | Appendix 6 and Appendix 9 - Large Site with Planning Permission not under construction | APS007(S) – Bridge End Road, Grantham                                 |
| SKR.APS.2204  | ACR228                   | Paul Hill – RPS Consulting Services Ltd on behalf of Persimmon Homes East Midlands | Appendix 6 and Appendix 9 - Large Site with Planning Permission not under construction | APS011(S) – The Grantham Church High School, Queensway, Grantham      |
| SKR.APS.2204  | ACR229                   | Paul Hill – RPS Consulting Services Ltd on behalf of Persimmon Homes East Midlands | Appendix 6 and Appendix 9 - Large Site with Planning Permission not under construction | APS017(S) – Land North of Barnack Road, Stamford                      |

|              |         |  |   |  |
|--------------|---------|--|---|--|
| SKR.APS.2204 | ACR2210 | Paul Hill – RPS Consulting Services Ltd on behalf of Persimmon Homes East Midlands | Appendix 2 and Appendix 9 – Proposed Local Plan Allocations | APS041 – LV-H7 Main Road (South), Long Bennington                    |
| SKR.APS.2204 | ACR2211 | Paul Hill – RPS Consulting Services Ltd on behalf of Persimmon Homes               | Appendix 2 and Appendix 9 – Proposed Local Plan Allocations | APS043 - LV-H10 Thistleton Lane and Mill Lane, South Witham          |
| SKR.APS.2204 | ACR2212 | Paul Hill – RPS Consulting Services Ltd on behalf of Persimmon Homes               | Appendix 2 and Appendix 9 – Proposed Local Plan Allocations | APS045 - DEP1-H1 Towngate West, Market Deeping                       |
| SKR.APS.2204 | ACR2213 | Paul Hill – RPS Consulting Services Ltd on behalf of Persimmon Homes               | Appendix 2 and Appendix 9 – Proposed Local Plan Allocations | APS047 – GR3-H1 Spitalgate Heath (Southern Quadrant), Grantham       |
| SKR.APS.2204 | ACR2214 | Paul Hill – RPS Consulting Services Ltd on behalf of Persimmon Homes               | Appendix 2 and Appendix 9 – Proposed Local Plan Allocations | APS048 - GR3-H2 Rectory Farm (Phase 2 North West Quadrant), Grantham |
| SKR.APS.2204 | ACR2215 | Paul Hill – RPS Consulting Services Ltd on behalf of Persimmon Homes               | Appendix 2 and Appendix 9 – Proposed Local Plan Allocations | APS049 - GR3-H4 Prince William of Gloucester                         |
| SKR.APS.2204 | ACR2216 | Paul Hill – RPS Consulting Services Ltd on behalf of Persimmon Homes               | Appendix 2 and Appendix 9 – Proposed Local Plan Allocations | APS054 - LV-H9 Folkingham Road, Morton                               |
| SKR.APS.2204 | ACR2217 | Paul Hill – RPS Consulting Services Ltd on behalf of Persimmon Homes               | Appendix 2 and Appendix 9 – Proposed Local Plan Allocations | APS055 - LV-H12 Part of Elm Farm Yard, Thurlby                       |
| SKR.APS.2204 | ACR2218 | Paul Hill – RPS Consulting Services Ltd on behalf of Persimmon Homes               | Appendix 2 and Appendix 9 – Proposed Local Plan Allocations | APS058 - STM1-H1 Stamford North, Stamford                            |

|              |         |  |  |   |
|--------------|---------|--|--|---|
| SKR.APS.2204 | ACR2219 | Paul Hill – RPS Consulting Services Ltd on behalf of Persimmon Homes | General – Land Supply conclusions  |   |
| SKR.APS.2204 | ACR2220 | Paul Hill – RPS Consulting Services Ltd on behalf of Persimmon Homes | Table 7  |   |
| SKR.APS.2205 | ACR2221 | Sport England – Sharron Wilkinson                                    | General  |   |
| SKR.APS.2206 | ACR2222 | Natural England – Dominic Rogers                                     | General  |   |
| SKR.APS.2207 | ACR2223 | Rutland County Council   | Appendix 2 and Appendix 9 – Proposed Local Plan Allocations                            | APS060 – Local Plan Allocation – Quarry Farm (Rutland)                                |
| SKR.APS.2208 | ACR2224 | Hannah Guy – Allison Homes   | Appendix 4 and Appendix 9 - Large Site with Planning Permission under construction     | APS002 – S14/3097: The Old Quarry, Station Road, Castle Bytham                        |
| SKR.APS.2208 | ACR2225 | Hannah Guy – Allison Homes   | Appendix 6 and Appendix 9 - Large Site with Planning Permission not under construction | APS003 - S13/1931: Land at Bridge End, Colsterworth, Lincolnshire                     |
| SKR.APS.2208 | ACR2226 | Hannah Guy – Allison Homes   | Appendix 3 and Appendix 9 – Sustainable Urban Extensions                               | APS025(N) - S20/0368: Land At Elsea Park, Bourne - Zone 8                             |
| SKR.APS.2208 | ACR2227 | Hannah Guy – Allison Homes   | Appendix 3 and Appendix 9 – Sustainable Urban Extensions                               | APS029 - S18/0937: Zone 9, Land East of A151, Raymond Mays Ways                       |
| SKR.APS.2208 | ACR2228 | Hannah Guy – Allison Homes   | Appendix 3 and Appendix 9 – Sustainable Urban Extensions                               | APS030 - S18/1840: Zone 9, Land to the North of Musselburgh Way, Elsea Park, PE10 OXY |

|              |         |   |   |  |
|--------------|---------|---|---|--|
| SKR.APS.2208 | ACR2229 | Hannah Guy – Allison Homes  | Appendix 2 and Appendix 9 – Proposed Local Plan Allocations | APS047 - GR3-H1 Spitalgate Heath, Grantham     |
| SKR.APS.2208 | ACR2230 | Hannah Guy – Allison Homes  | Appendix 2 and Appendix 9 – Proposed Local Plan Allocations | APS049 - GR3-H4 Prince William of Gloucester   |
| SKR.APS.2208 | ACR2231 | Hannah Guy – Allison Homes  | Appendix 2 and Appendix 9 – Proposed Local Plan Allocations | APS055 - LV-H12 Part of Elm Farm, Thurlby      |
| SKR.APS.2208 | ACR2232 | Hannah Guy – Allison Homes  | Appendix 2 and Appendix 9 – Proposed Local Plan Allocations | APS058 - STM1-H1 Stamford North                |
| SKR.APS.2209 | ACR2233 | Liberty Stones – Fisher German LLP on behalf of Defence Infrastructure Organisation | Appendix 2 and Appendix 9 – Proposed Local Plan Allocations | APS049 - - GR3-H4 Prince William of Gloucester |

| Statement of Engagement Representation Comment Index |                   |   |                             |   |
|--|-------------------|---|-----------------------------|---|
| Representation Reference                             | Comment Reference | Name/Organisation   | Draft APS Section/Paragraph | APS Site Reference Code and Name                                      |
| SKR.APS.2208   | ACR223            | Stephen Short – Escritt Barrell Golding on behalf of The Jenkinson Family | General                     | APS048 – GR3-H2 Rectory Farm (Phase 2 North West Quadrant, Grantham). |

## Amy Bonfield

---

**From:** Hazel Smith [REDACTED]  
**Sent:** 10 June 2022 09:57  
**To:** PLANNING POLICY  
**Subject:** RE: South Kesteven District Council – Draft Annual Position Statement Consultation

**Categories:** Orange Category, Purple Category

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Shaza,

Thank you for your consultation on the Draft Annual Position Statement 2022.

ACR221 The Canal & River Trust are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

On this occasion the Trust has **no comment** to make on this document, but welcome your continued engagement with us on planning policy documents.

Kind regards

**Hazel Smith**

MRTPI

Area Planner - Midlands

M [REDACTED]

E [REDACTED]



**Canal & River Trust**

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 06 June 2022 12:00  
**To:** [REDACTED]  
**Subject:** FW: South Kesteven District Council – Draft Annual Position Statement Consultation

---

**From:** PLANNING POLICY <[PLANNINGPOLICY@southkesteven.gov.uk](mailto:PLANNINGPOLICY@southkesteven.gov.uk)>  
**Sent:** 06 June 2022 11:56  
**To:** PLANNING POLICY <[PLANNINGPOLICY@southkesteven.gov.uk](mailto:PLANNINGPOLICY@southkesteven.gov.uk)>  
**Subject:** South Kesteven District Council – Draft Annual Position Statement Consultation



**SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL**

**South Kesteven District Council**  
**Draft Annual Position Statement Consultation Response Form**  
**Monday 6<sup>th</sup> June to 11.59pm Friday 1<sup>st</sup> July 2022**

**This form has three parts**

**Part A** is for your personal details.

**Part B** is your representation(s) on the Draft Annual Position Statement

**Part C** is your representation (s) on the accompanying Draft Statement of Engagement

**How to respond:**

Please fill in the response form for each section you wish to comment on. It is important that you state the paragraph number(s) and section(s) your representation relates to (e.g. 1.0 Introduction/ paragraph 1.1). This will enable us to process your comments efficiently and effectively.

Respond by returning forms by:

**Email:** to [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be sent to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ.

**The Deadline for responses is 11:59pm on Friday 1<sup>st</sup> July 2022**

All representations will be made publicly available and must be received by 11:59pm on Friday 1<sup>st</sup> July 2022.

## Part A: Personal Details


|               | 1. Personal Details  | 2. Agents Details (if Applicable) |
|---------------|----------------------|-----------------------------------|
| Title         |                      | Mr                                |
| First Name    |                      | Stephen                           |
| Last Name     |                      | Short                             |
| Organisation  | The Jenkinson Family | Escritt Barrell Golding           |
| Address       |                      |                                   |
| Postcode      |                      |                                   |
| Telephone     |                      |                                   |
| Email Address |                      |                                   |

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

**3. If you are not already on our consultation database and you respond your details will automatically be added to the database**

If you do not wish to be added or would like your details to be removed, then please select the following box

**4. Please Sign and date this form:**

| Signature (please type for an electronic response)   | Date         |
|--|--------------|
| <br>S G J Short on behalf of the Jenkinson Family | 14 June 2022 |



**Part B: Your Representation on the Draft Annual Position Statement**

**PLEASE USE ONE FORM FOR EACH REPRESENTATION**

|   |                          |
|---|--------------------------|
| <b>5. To which Section(s) does your representation relate to?</b>   | Housing Supply           |
| <b>6. To which Paragraph(s) does your representation relate to?</b> | Table 5 -APSO48 – GR3-H2 |

**7. Please set out your representation on the Annual Position Statement.**  
Please be as precise as possible.

On behalf of the Jenkinson Family I confirm satisfaction with the details included.

(Continue on a separate sheet/expand box if necessary).

|   |            |                          |           |                                     |
|---|------------|--------------------------|-----------|-------------------------------------|
| <b>8. Are you attaching any additional sheets that relate to this representation?</b> | <b>Yes</b> | <input type="checkbox"/> | <b>No</b> | <input checked="" type="checkbox"/> |
| <b>If yes, please indicate total additional sheets</b>                                |            |                          |           |                                     |

**Part C: Your Representation on the Accompanying Statement of Engagement**

**PLEASE USE ONE FORM FOR EACH REPRESENTATION**

|  |       |
|--|-------|
| <b>9. To which Section(s) does your representation relate to?</b>    | Whole |
| <b>10. To which Paragraph(s) does your representation relate to?</b> | -     |

**11. Please set out your representation on the Accompanying Statement of Engagement**

Please be as precise as possible.

On behalf of the Jenkinson Family I confirm satisfaction with the details included.

(Continue on a separate sheet/expand box if necessary).

|  |            |  |           |          |
|--|------------|--|-----------|----------|
| <b>12. Are you attaching any additional sheets that relate to this representation?</b> | <b>Yes</b> |  | <b>No</b> | <b>x</b> |
| <b>If yes, please indicate total additional sheets</b>                                 |            |  |           |          |



[PLANNINGPOLICY@southkesteven.gov.uk](mailto:PLANNINGPOLICY@southkesteven.gov.uk)

Our ref:  
PL00776922  
Your ref:

Telephone

15 June 2022

Dear Ms Brannon

**South Kesteven District Council Draft Annual Position Statement Consultation**

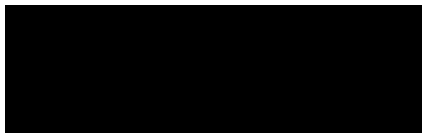
ACR224

Thank you for consulting Historic England on the above 6 June 2022.

Historic England have no comments to raise if no additional sites are proposed at this stage.

Please do not hesitate to contact me if you wish to discuss,

Yours sincerely



Emilie Carr (Mrs)  
Historic Environment Planning Adviser  
E-mail: [REDACTED]





**South Kesteven District Council**  
**Draft Annual Position Statement Consultation Response Form**  
**Monday 6<sup>th</sup> June to 11.59pm Friday 1<sup>st</sup> July 2022**

**This form has three parts**

**Part A** is for your personal details.

**Part B** is your representation(s) on the Draft Annual Position Statement

**Part C** is your representation (s) on the accompanying Draft Statement of Engagement

**How to respond:**

Please fill in the response form for each section you wish to comment on. It is important that you state the paragraph number(s) and section(s) your representation relates to (e.g. 1.0 Introduction/ paragraph 1.1). This will enable us to process your comments efficiently and effectively.

Respond by returning forms by:





**Email:** to [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be sent to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ.

**The Deadline for responses is 11:59pm on Friday 1<sup>st</sup> July 2022**

All representations will be made publicly available and must be received by 11:59pm on Friday 1<sup>st</sup> July 2022.

## **Part A: Personal Details**

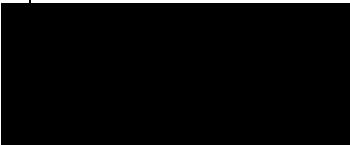
|               | 1. Personal Details                       | 2. Agents Details (if Applicable)  |
|---------------|---|--|
| Title         |   | Mr   |
| First Name    |   | Paul   |
| Last Name     |   | Hill   |
| Organisation  | Persimmon Homes East Midlands (c/o agent) | RPS Consulting Services Ltd  |
| Address       |   |    |
| Postcode      |   |  |
| Telephone     |   |  |
| Email Address |   |  |

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

### **3. If you are not already on our consultation database and you respond your details will automatically be added to the database**

If you do not wish to be added or would like your details to be removed, then please select the following box

### **4. Please Sign and date this form:**

| Signature (please type for an electronic response)                                  | Date         |
|---|--------------|
|  | 23 June 2022 |

## **Part B: Your Representation on the Draft Annual Position Statement**

**PLEASE USE ONE FORM FOR EACH REPRESENTATION**

|   |         |
|---|---------|
| <b>5. To which Section(s) does your representation relate to?</b>   |         |
| <b>6. To which Paragraph(s) does your representation relate to?</b> | Table 3 |

### **7. Please set out your representation on the Annual Position Statement.** Please be as precise as possible.

#### **Housing Requirement (2022-2027)**

Table 3 of the draft APS identifies a 5-year requirement for **3,912** dwellings. This takes into account the under-delivery of housing between 2011 and 2022, resulting in a current shortfall of 859 dwellings at April 2022. This represents an increase of 165 dwellings in the shortfall over the last year, which was 694 dwellings at April 2021. The Council has dealt with the shortfall by applying the 'Liverpool' method, which spreads the shortfall over the remainder of the plan period (in this case 14 years) rather than over the next five years using the 'Sedgefield' method. This approach is based on commentary set out at paragraph 5.13 of the adopted Local Plan which states:

*"The trajectory shows a shortfall of housing since 2011. A deliverable land supply is to be calculated using the Liverpool Method for the first five years of the Plan Period, taking account of the shortfall since 2011 across the plan period."*

Nonetheless, the use of the Liverpool method has been disputed through both the 2020 and 2021 APS processes in South Kesteven. The Council claims (at paragraph 3.4 of the draft APS) that the reference in the local plan at paragraph 5.13 "...aims to set out that the Liverpool Method to deal with past under supply..." and that the Examiner of the 2020 APS 'confirms' the use of the Liverpool method in addressing the shortfall based on commentary in the Local Plan Inspector's Final Report<sup>1</sup>.

However, whilst the 2021 APS Examiner agreed with the previous Examiner on this issue, that examiner nonetheless concluded that the wording in the local plan being relied upon by the Council "...is not entirely clear..." (see paragraph 14 of the final report). Given the wording in adopted Local Plan is acknowledged as being unclear on how shortfall should be addressed, RPS contend the APS should be assessed against national policy and

---

<sup>1</sup> SKLP Inspectors Report dated 6 January 2020, paragraph 146

guidance<sup>2</sup>, which advocates the use of the Sedgefield method as the preferred approach to dealing with housing shortfalls.

Furthermore, the use of the Liverpool method can only be justified where this can assist Councils in reducing housing shortfalls at the local level. However, it is plainly the case that the shortfall position is worsening in South Kesteven, not improving. The graph below, which uses the Council's completions data (see Table 1 of the draft APS), shows the extent of the worsening shortfall position in South Kesteven since 2011.



It is also notable that the housing shortfall has continued to worsen despite the adoption of the Local Plan in January 2020. It is therefore evident that the use of the Liverpool method is not an adequate mechanism for reducing the shortfall in housing delivery in South Kesteven, and is actually masking the problem by pushing the shortfall further into the future rather than incentivising the Council to address the shortfall now.

On this basis, RPS contends that a more appropriate response would be to determine a five-year housing requirement in line with the preferred approach set out national policy and guidance, which would account for the shortfall over the next five years (rather than 14 years as in this case). From this, the Council should then encourage additional sites to come forward in the short-term, through the planning application process, to assist in tackling the shortfall and thus bring delivery back in alignment with planned targets.

<sup>2</sup> Paragraph: 031 Reference ID: 68-031-20190722 Revision date: 22 July 2019

As a result, the five-year housing requirement should be increased from 3,912 to 4,520 dwellings. The calculation of this alternative figure is set out below.

| Alternative 5 Year Housing Land Requirement 2022/23 –<br>2026/27 : South Kesteven |              |
|---|--------------|
|   |              |
| <b>2011-2036</b>  | 16,125       |
| <b>Net additions 2011/12-2021/22</b>  | 6,166        |
| <b>Shortfall of housing 2011/12-2021/22</b>                                       | 859          |
| <b>Requirement for 5 years 2022-2027 (including shortfall )<br/>(650*5+859)</b>   | 4,109        |
| <b>10% Buffer required</b>  | 411          |
| <b>Total requirement, including shortfall, plus buffer</b>                        | <b>4,520</b> |

The housing requirement figure of **4,520 dwellings** should be used for the purposes of assessing in the land supply position in South Kesteven as part of this APS process.

(Continue on a separate sheet/expand box if necessary).





SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

For Official Use Only:

Ref:

**South Kesteven District Council**  
**Draft Annual Position Statement Consultation Response Form**  
**Monday 6<sup>th</sup> June to 11.59pm Friday 1<sup>st</sup> July 2022**

**This form has three parts**

**Part A** is for your personal details.

**Part B** is your representation(s) on the Draft Annual Position Statement

**Part C** is your representation (s) on the accompanying Draft Statement of Engagement

**How to respond:**

Please fill in the response form for each section you wish to comment on. It is important that you state the paragraph number(s) and section(s) your representation relates to (e.g. 1.0 Introduction/ paragraph 1.1). This will enable us to process your comments efficiently and effectively.

Respond by returning forms by:

**Email:** to [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be sent to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ.

**The Deadline for responses is 11:59pm on Friday 1<sup>st</sup> July 2022**

All representations will be made publicly available and must be received by 11:59pm on Friday 1<sup>st</sup> July 2022.

## **Part A: Personal Details**

|               | 1. Personal Details | 2. Agents Details (if Applicable) |
|---------------|---------------------|-----------------------------------|
| Title         |                     | See separate form                 |
| First Name    |                     |                                   |
| Last Name     |                     |                                   |
| Organisation  |                     |                                   |
| Address       |                     |                                   |
| Postcode      |                     |                                   |
| Telephone     |                     |                                   |
| Email Address |                     |                                   |

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

|  |
|--|
| <b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b> |
|--|

|   |  |
|---|--|
| If you do not wish to be added or would like your details to be removed, then please select the following box |  |
|---|--|

### **4. Please Sign and date this form:**

| Signature (please type for an electronic response) | Date |
|--|------|
| See separate form                                  |      |

## **Part B: Your Representation on the Draft Annual Position Statement**

### **PLEASE USE ONE FORM FOR EACH REPRESENTATION**

|   |                                     |
|---|-------------------------------------|
| <b>5. To which Section(s) does your representation relate to?</b>   |                                     |
| <b>6. To which Paragraph(s) does your representation relate to?</b> | Table 4; Appendix 1; and Appendix 9 |

#### **7. Please set out your representation on the Annual Position Statement.**

Please be as precise as possible.

##### **The Council's Housing Land Supply Position**

Table 4 of the draft APS provides an updated position on land supply in South Kesteven at April 2022. The Council's claimed deliverable supply is now 4,957 dwellings for the period 2022-2027. This represents a 956 dwelling increase above the previous year's position, based on the findings of the 2021 APS Examiner who concluded the actual supply position to be 4,001 dwellings (see paragraph 64 of the final report).

This change in position represents a substantial increase (24%) in the total deliverable supply in just one year. It is therefore critical that this increase in supply is fully consistent with national policy and in particular the definition of *deliverability* set out in the NPPF<sup>1</sup>. In this regard, RPS has reviewed the Council's updated supply schedules and has a number of representations to make on the claimed supply, set out below. This includes, where relevant, reference to evidence provided in Appendix 1 of the Draft Statement of Engagement and Appendix 1: Site Deliverability Information consultation document.

##### **Critique of the Council's Supply - Strategic Large Sites and Local Plan Allocations**

###### **Large Sites with Planning Permission not Under Construction**

Information on this category of site is provided in Appendix 6 and 9 of the draft APS, and in Draft Statement of Engagement site information. The APS identifies 9 sites in this category. In accordance with the definition, 'clear evidence' must be provided to demonstrate sites are deliverable.

###### ***APS007(S) - Bridge End Road, Grantham***

This site is included with the assumption that 120 dwellings are deliverable in the five-year period. Outline permission granted in November 2021. A section 106 agreement has been

<sup>1</sup> NPPF 2021, paragraph 68

signed. Council assumes delivery from year 3 (2024/25) onwards at 40 dpa. However, site deliverability information provides no signed confirmation that all landowners are committed to development on the site. Trajectory information (Appendix 9) indicates a reserved matters application is 'expected 2022' but no further details on what progress has been made towards an RMA. Not clear from Council's planning register what progress is being made, if any, towards discharge of conditions on the site. On this basis, site does not meet the 'clear evidence' test under the NPF definition.

RPS recommends that 120 dwellings should be discounted from the supply.

*APS011(S) - The Grantham Church High School, Queensway, Grantham*

This site is included with assumption that 40 dwellings are deliverable in the five-year period. Outline planning permission granted in December 2021. A section 106 agreement has been signed. Council assumes delivery in year 4 (2025/26) at 40 dpa. However, no delivery information submitted by the applicant and so signed confirmation that all landowners are committed to development on the site. Council's delivery assumptions based on similar sites only. No further details provided on what progress has been made towards a reserved matters application. Not clear from Council's planning register what progress is being made, if any, towards discharge of conditions on the site. On this basis, site does not meet the 'clear evidence' test under the NPPF definition.

RPS recommends that 40 dwellings should be discounted from the supply.

*APS017(S) - Land North Of Barnack Road, Stamford*

This site is included with assumption that 80 dwellings are deliverable in the five-year period. Outline planning permission granted in February 2022, for mixed use development. A section 106 agreement has been signed. Council assumes delivery in year 4 (2025/26) and 5 at 40 dpa. However, no delivery information submitted by the applicant and so signed confirmation that all landowners are committed to development on the site. Council's delivery assumptions based on similar sites only. Some progress made towards discharge of conditions on the site but no further details provided on what progress has been made towards a reserved matters application. On this basis, site does not meet the 'clear evidence' test under the NPPF definition.

RPS recommends that 80 dwellings should be discounted from the supply.

**In total, RPS contends that 240 dwellings should be discounted from this component of the Council's supply.**

### **Proposed Local Plan Allocations**

Information on this category of site is provided in Appendix 2 and 9 of the draft APS, and in Draft Statement of Engagement site information. The APS identifies 9 sites in this category. In accordance with the definition, 'clear evidence' must be provided to demonstrate sites are deliverable.

#### *LV-H7 Main Road (South), Long Bennington*

This site is included with assumption that 10 dwellings are deliverable in the five-year period. Outline planning permission was issued granted on 24 June 2021 subject to signing of a s106. S106 signed on 19 April 2022. Council assumes delivery in year 5 (2026/27). However, no delivery information submitted by the applicant and so signed confirmation that all landowners are committed to development on the site. Council's delivery assumptions based on similar sites only. No further details provided on what progress has been made towards a reserved matters application. Not clear from Council's planning register what progress is being made, if any, towards discharge of conditions on the site. On this basis, site does not meet the 'clear evidence' test under the NPPF definition.

RPS recommends that 10 dwellings should be discounted from the supply.

#### *LV-H10: Thistleton Lane and Mill Lane, South Witham*

This site is included with assumption that 24 dwellings are deliverable in the five-year period. No planning application of any description submitted at this time. Council assumes delivery in year 3 (2024/25) onwards. However, delivery information identifies site constraints (Ecology) with no clear details on what these are, how this is to be resolved, and how this might impact on timescales for progressing the site. No further details provided on what progress has been made towards a planning application beyond the general comments provided by the promoter. On this basis, site does not meet the 'clear evidence' test under the NPPF definition.

RPS recommends that 24 dwellings should be discounted from the supply.

#### *DEP1-H1: Towngate West, Market Deeping*

This site is included with assumption that 73 dwellings are deliverable in the five-year period.

No planning application of any description submitted at this time. Council assumes delivery in year 4 (2025/26) onwards. Submitted delivery information refers to the 'intention to prepare and submit a planning application by end of 2022'. Council's predicted delivery timeframe disputed by the site promoter, but delivery information only points to 'approximate' timeframe for delivery some time in 2025/26. Also, uncertainty regarding provision of affordable housing which is a key policy requirement in the Local Plan. No further details provided on what progress has been made towards a planning application beyond the general comments provided by the promoter. On this basis, site does not meet the 'clear evidence' test under the NPPF definition.

RPS recommends that 73 dwellings should be discounted from the supply.

*GR3-H1: Spitalgate Heath - Garden Village (Southern Quadrant), Grantham*

This site is included with assumption that 275 dwellings are deliverable in the five-year period, but the total site capacity is significantly larger c. 3,700 dwellings. Outline planning application was submitted in 2014 but a decision has yet to be issued. Highly complex and sensitive development site. The updated site delivery information submitted by the applicant notes that a case officer is no longer appointed to deal with this application given the previous officer has now left the Council in February 2022 (Part A). Also noted are the applicant's comments that '*various development issues*' are identified '*that could affect deliverability and viability*' of development on the site, and that '*It is difficult to predict when development may commence on site...Progress on these matters is very slow...*' (Part B, section 2).

It is clear from the applicant's own comments that significant uncertainties exist regarding the deliverability of this site. The previous APS Examiner in 2021 concluded that 175 dwellings were deliverable in the previous five-year period and that development could commence and deliver new homes from year 4 (2024/25) onwards (see paragraph 33-37 of the Examiner's final report for details). However, that was on the assumption that Council officers were working on the application (which is now not confirmed), a reserved matters application would anticipated in 'late 2022' +73+(which now seems unlikely), and that the Grantham Southern Relief Road would be completed and open by May 2023 (which has now been put back to winter 2023, according to Lincolnshire County Council project website<sup>2</sup>). Given all these factors, including the likely viability issues and the delays in

---

<sup>2</sup> <https://www.lincolnshire.gov.uk/major-projects/grantham-southern-relief-road>

determining the outline application highlighted by the applicant, RPS contends that the delivery of homes during the five-year period is not supported by 'clear evidence'.

On this basis, RPS recommends that 275 dwellings should be discounted from the supply.

*GR3-H2: Rectory Farm (Phase 2 North West Quadrant), Grantham*

This site is included with assumption that 330 dwellings are deliverable in the five-year period, but which has a total capacity of c.1,265 dwellings. The Council's trajectory comments in Appendix 9 of the draft APS highlight three separate planning applications relating to this site, but it is not clear from the information as to the current status of these applications. The updated site deliverability information submitted by the applicant also indicates that delivery of this element of supply is linked to the progression of the adjacent Poplar Farm development. Condition 21 of the Poplar Farm approval establishes the need for a new bridge over the railway linking the development to the Pennine Way, which would be required before 751 dwellings are built and occupied. This condition has yet to be discharged and any attempt to depart from this condition would necessitate a fresh planning application. If there are delays in the construction of the bridge, this could have knock-on effects on the likely commencement of the Rectory Farm development.

The Council assumes delivery will commence and deliver first completions of new homes from year 2 (2023/24) onwards with deliver rates starting at 60 dpa (years 2 and 3), 90 dpa in year 4, and 120 dpa in year 5. This is based on the applicant's own estimates. However, in light of the comments above, the site delivery information indicates that commencement could be delayed by 2 to 3 years due to wider objectives requiring the necessary integration of this site with the Poplar Farm development in order to achieve a comprehensive scheme in this location. This introduces significant uncertainty regarding the likely timescale for delivering the site that remains unresolved. On this basis, the site could be delayed until year 3 (2024/25) at the earliest before any development commences. As a result, RPS contend that delivery should be pushed back a further year to account for the potential delays and uncertainties highlighted here.

RPS therefore recommends that 120 dwellings (from year 5) should be discounted from the Council's supply.

*GR3-H4: Prince William of Gloucester Barracks, Grantham*

This site is included with assumption that 175 dwellings are deliverable in the five-year period, but which has a total capacity of c. 4,000 dwellings. No planning application has been submitted for this site. The Council's trajectory in Appendix 9 of the draft APS assumes commencement and delivery of first completions during 2025, with 50 dwellings built during year 4 (2025/26) and 125 dwellings in year 5. Site identified as 'strategic allocation' in the adopted local plan. Delivery of development on the site requires the current occupier (the Ministry of Defence) to vacate the site.

However, since the previous APS 2021 was confirmed by the Examiner in October 2021 which included this site, the Ministry of Defence announced in December 2021 that the Barracks will remain open to 2028, deferring the closure and sale of the site by four years<sup>3</sup>. This represents significant new evidence that supersede previous assessment of the site which has not been taken into account by the Council in the draft APS. The fact the site will not now be vacated or sold until 2028 provides clear evidence that delivery of new homes on this site is unlikely within the five year period (ending in end of March 2027). On this basis, site does not meet the 'clear evidence' test under the NPPF definition.

RPS recommends that 175 dwellings should be discounted from the supply.

*LV-H9: Folkingham Road, Morton*

This site is included with assumption that 71 dwellings are deliverable in the five-year period. The Council's trajectory in Appendix 9 of the draft APS assumes commencement and delivery of first completions during 2024, with 30 dwellings built during year 3 (2024/25) and 41 dwellings in years 4 and 5. Site has outline planning permission. Site delivery information indicates that the site owner (LCC) is in negotiations to sell the site. The site promoter accepts that negotiations are at an early stage therefore there is currently no formal developer commitment in place as the new owner is not yet known. There are other numerous other actions that will need to be undertaken and, if necessary, addressed prior to the sale of the site, including ground investigations which must be undertaken prior to completing the sale. As a result, there is no date for the submission of a reserved matters application, however, the promoter anticipates that this will be within the next 12 to 24 months. Furthermore, not clear from Council's planning register what progress is being made, if any, towards discharge of conditions on the site. RPS contend this does not represent 'firm' progress in bringing forward a reserved matters application on this site. The

<sup>3</sup> <https://www.granthammatters.co.uk/granthams-prince-william-of-gloucester-barracks-closure-deferred/>



information issued by the Council does not meet the clear evidence under the NPPF definition.

On this basis, RPS recommend that 71 dwellings are discounted from the Council's supply.

*LV-H12: Part of Elm Farm Yard, Thurlby*

This site is included with assumption that 30 dwellings are deliverable in the five-year period. The Council's trajectory in Appendix 9 of the draft APS assumes commencement and delivery of first completions during 2024, with 10 dwellings built during year 3 (2024/25) and 10 dwellings in years 4 and 5. No planning application has been submitted for this site. The Examiner of the previous APS considered there was 'firm intent' to submit a planning application and that, on the basis that the developer had indicated an application was 'imminent'. That position would have been taken from information submitted by the Council to the Examiner in July 2021. However, it is now June 2022 and there still remains no planning application (at the time of writing). This represents a further delay in bringing forward the site. Whilst RPS notes the promoter's comment that an application is to be submitted 'asap' this provides no clarity on what work is being undertaken or what further work is needed to allow a valid planning application to be submitted. RPS does not consider the information presented as sufficient to demonstrate 'firm progress' is being made and thus does not meet the clear evidence test under the NPPF definition.

On this basis, RPS recommends that 30 dwellings are discounted from the Council's supply.

*Site STM1-H1 Stamford North, Stamford*

This site is included with assumption that 170 dwellings are deliverable in the five-year period. The Council's trajectory in Appendix 9 of the draft APS assumes commencement and delivery of first completions during 2024, with 40 dwellings built during year 3 (2024/25), 60 dwellings during year 4 (2025/26) and 70 dwellings during year 5 (2026/27). Previous 2021 APS assumed commencement and delivery of first completions during 2024 was appropriate, based on the Examiner's findings. Nevertheless, this was predicated on a planning application being submitted during (2021/22) which equates to the end of March 2022. However, the Council's own evidence in Appendix 9 of the draft APS now expects the submission in 'late 2022'. The reason for pushing back of the planning application submission has not been explained and therefore it cannot be assumed that this extended timeframe will be adhered to. The delay in submission would push back commencement on site by at least 9 months, and possibly longer. On this basis, RPS recommends the delivery

on this site is pushed back by one year to reflect this further delay, with commencement and delivery of first completions during 2025.

As a result, RPS recommends that 70 dwellings are discounted from the Council's supply.

**In total, RPS contends that 848 dwellings should be discounted from this component of the Council's supply.**

#### **Conclusions on Land Supply in South Kesteven**

Based on the analysis set out above, RPS contends that the Council's land supply should be discounted by a total of 1,088 dwellings. This summarised in the table below.

| Dwellings                                      |                   |
|--|-------------------|
| <b>SKDC Supply figure at end of March 2022</b> | 4,957             |
| <b>RPS deductions</b>                          | 1,088 (240 + 848) |
| <b>Revised SKDC supply</b>                     | <b>3,869</b>      |

The result is that the Council's supply is reduced to 3,869 dwellings over the five-year period. This will have a significant impact on the land supply position in South Kesteven. RPS sets out the impact of the reduced supply in a separate submission in response to Table 7 of the draft APS.

(Continue on a separate sheet/expand box if necessary).



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

For Official Use Only:

Ref:

**South Kesteven District Council**  
**Draft Annual Position Statement Consultation Response Form**  
**Monday 6<sup>th</sup> June to 11.59pm Friday 1<sup>st</sup> July 2022**

**This form has three parts**

**Part A** is for your personal details.

**Part B** is your representation(s) on the Draft Annual Position Statement

**Part C** is your representation (s) on the accompanying Draft Statement of Engagement

**How to respond:**

Please fill in the response form for each section you wish to comment on. It is important that you state the paragraph number(s) and section(s) your representation relates to (e.g. 1.0 Introduction/ paragraph 1.1). This will enable us to process your comments efficiently and effectively.

Respond by returning forms by:

**Email:** to [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be sent to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ.

**The Deadline for responses is 11:59pm on Friday 1<sup>st</sup> July 2022**

All representations will be made publicly available and must be received by 11:59pm on Friday 1<sup>st</sup> July 2022.

## **Part A: Personal Details**

|               | 1. Personal Details | 2. Agents Details (if Applicable) |
|---------------|---------------------|-----------------------------------|
| Title         |                     | See separate form                 |
| First Name    |                     |                                   |
| Last Name     |                     |                                   |
| Organisation  |                     |                                   |
| Address       |                     |                                   |
| Postcode      |                     |                                   |
| Telephone     |                     |                                   |
| Email Address |                     |                                   |

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

|  |
|--|
| <b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b> |
|--|

|   |  |
|---|--|
| If you do not wish to be added or would like your details to be removed, then please select the following box |  |
|---|--|

### **4. Please Sign and date this form:**

| Signature (please type for an electronic response) | Date |
|--|------|
| See separate form                                  |      |

## Part B: Your Representation on the Draft Annual Position Statement

PLEASE USE ONE FORM FOR EACH REPRESENTATION

|  |         |
|--|---------|
| 5. To which Section(s) does your representation relate to?   |         |
| 6. To which Paragraph(s) does your representation relate to? | Table 7 |

**7. Please set out your representation on the Annual Position Statement.**  
Please be as precise as possible.

### **Updated Five-Year Housing Land Supply calculation (2022-2027) – South Kesteven**

Table 7 of the draft APS presents the five-year land supply calculation. This is reproduced below, for reference. The Council contend the land supply position is **6.33 years**.

Table 7: 5 Year Housing Land Supply (Liverpool Method) Local Plan Development Plan Period 2011-2036

| 5 Year Housing Land Supply 2022/23 – 2026/27                         |                     |
|--|---------------------|
|  | Number of Dwellings |
| a) 2011-2036   | 16125               |
| b) Net additions 2011/12-2021/22                                     | 6166                |
| c) Shortfall of housing 2011/12-2021/22                              | 859                 |
| d) Requirement for 14 years 2022-2036 (650 * 14) plus shortfall      | 9959                |
| e) Requirement for 5 years 2022-2027 (including shortfall ((d/14)*5) | 3557                |
| f) 10% Buffer required   | 356                 |
| g) Total requirement, including shortfall, plus buffer               | 3912                |
| h) Expected supply of deliverable sites to 2027                      | 4957                |
| i) Surplus over requirement (h-g)                                    | 1045                |
| j) Number of years supply (h/g)*5                                    | 6.33                |

Based on the findings set out in representations submitted in response to Table 4 of the draft APS, RPS can now provide an updated land supply calculation that properly reflects the evidence relied upon by the Council, based on a supply of 3,869 dwellings. This is summarised in the table below.

| 5 Year Housing Land Supply 2022/23 – 2026/27 : South Kesteven | RPS requirement | SKDC requirement |
|---|-----------------|------------------|
| 2011-2036   | 16,125          | 16,125           |
| Net additions 2011/12-2021/22                                 | 6,166           | 6,166            |
| Shortfall of housing 2011/12-2021/22                          | 859             | 307              |
| Requirement for 5 years 2022-2027 (650*5 + shortfall )        | 4,109           | 3,557            |
| 10% Buffer required   | 411             | 356              |
| Total requirement, including shortfall, plus buffer           | 4,520           | 3,912            |
| RPS expected supply of deliverable sites to 2027              | 3,869           | 3,869            |
| Surplus over requirement                                      | -651            | -43              |
| <b>Number of years supply</b>                                 | <b>4.28</b>     | <b>4.95</b>      |

It can be seen that against either housing land requirements, the supply position is significantly reduced and in both cases falls below the five year minimum, ranging between **4.28 to 4.95 years**. On this basis, RPS contends that the Council is unable to demonstrate a five year supply of deliverable land and so is unable to confirm their land supply position through the updated Annual Position Statement process.

(Continue on a separate sheet/expand box if necessary).

## Amy Bonfield

---

**From:** Sharron Wilkinson [REDACTED]  
**Sent:** 23 June 2022 16:18  
**To:** PLANNING POLICY  
**Subject:** Draft Annual Position Statement Consultation

**Categories:** Purple Category, Orange Category

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Shaza Brannon

ACR2221 Thank you for consulting Sport England on the above consultation. I can confirm that we have no comments to make.

Yours sincerely,

**Sharron Wilkinson MRTPI**  
Planning Manager

[REDACTED]  
[REDACTED]  
[REDACTED]



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [REDACTED]

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If

**Amy Bonfield**

---

**From:** SM-NE-Consultations (NE) [REDACTED]  
**Sent:** 24 June 2022 15:37  
**To:** PLANNING POLICY  
**Subject:** South Kesteven District Council – Draft Annual Position Statement Consultation Response

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Sir/Madam,

Our Ref: 395138

**South Kesteven District Council – Draft Annual Position Statement**

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Natural England has no comments to make on the Draft Annual Position Statement**

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

Should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours faithfully,

Dominic Rogers  
Consultations Team  
Natural England

[REDACTED]

Enquiries line: [REDACTED]

Email: [REDACTED]

[REDACTED]



Thriving Nature  
for people and planet

---

**From:** PLANNING POLICY <[PLANNINGPOLICY@southkesteven.gov.uk](mailto:PLANNINGPOLICY@southkesteven.gov.uk)>  
**Sent:** 06 June 2022 11:56



**Amy Bonfield**

---

**From:** Local Plan [REDACTED]  
**Sent:** 27 June 2022 16:42  
**To:** PLANNING POLICY  
**Subject:** RE: Rutland County Council Response to South Kesteven District Council – Draft Annual Position Statement Consultation

**Categories:** Purple Category

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello Amy,

Please find below Rutland County Council's response to South Kesteven's draft Annual Position Statement Consultation:

ACR2223 Rutland County Council note the 650 dwellings proposed at Quarry Farm within Rutland are not included in the table and do not form part of the 5 year deliverable housing supply for South Kesteven. However, it is unclear whether there would be an intention to do so if the site would be considered deliverable.

Rutland County Council have advised SKDC that their intention is that any development on the Quarry Farm site would be required now to meet Rutland's housing needs and this matter is still subject to discussions between the two authorities. The Quarry Farm site is not allocated in the adopted development plan for Rutland. Until there is resolution to this debate – either through the development plans for each respective authority or through the determination of the current application at Quarry Farm in Rutland – the County Council considers that any development at Quarry Farm should **not** form part of South Kesteven's Annual Position Statement.

Kind Regards

Sharon

**The Local Plan Team | Planning Policy**  
 Rutland County Council



Details regarding your data protection rights and how the Council processes your data can be found at:  
[www.rutland.gov.uk/my-council/data-protection](http://www.rutland.gov.uk/my-council/data-protection)

---

**From:** PLANNING POLICY <PLANNINGPOLICY@southkesteven.gov.uk>  
**Sent:** 22 June 2022 11:04  
**To:** PLANNING POLICY <PLANNINGPOLICY@southkesteven.gov.uk>  
**Subject:** South Kesteven District Council – Draft Annual Position Statement Consultation

Dear Sir/Madam,

This is a reminder that the consultation on the 2022 Draft Annual Position Statement is due to close at **11.59pm Friday 1<sup>st</sup> July 2022.**

Please see below the original email with information of this consultation.

If you have any comments on the Draft Annual Position Statement or accompanying Draft Statement of Engagement, please fill in the attached response form and return by Friday 1<sup>st</sup> July 2022 to [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or post to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ.

Thank you for your time and assistance.

Kind regards  
Amy

**Planning Policy Team**

South Kesteven District Council  
Development and Growth  
Council Offices, St. Peter's Hill  
Grantham, Lincolnshire, NG31 6PZ  
Tel: 01476 406080  
Email: [Planningpolicy@southkesteven.gov.uk](mailto:Planningpolicy@southkesteven.gov.uk)  
[www.southkesteven.gov.uk](http://www.southkesteven.gov.uk)

---

**From:** PLANNING POLICY

**Sent:** 06 June 2022 11:56

**To:** PLANNING POLICY <[PLANNINGPOLICY@southkesteven.gov.uk](mailto:PLANNINGPOLICY@southkesteven.gov.uk)>

**Subject:** South Kesteven District Council – Draft Annual Position Statement Consultation



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

Planning Policy  
South Kesteven District Council  
Council Offices, St Peters Hill  
Grantham, Lincolnshire,  
NG31 6PZ  
Tel: 01476 406 080

Email: [Planningpolicy@southkesteven.gov.uk](mailto:Planningpolicy@southkesteven.gov.uk)

Date: Monday 6<sup>th</sup> June 2022

**Draft Annual Position Statement Consultation - Monday 6<sup>th</sup> June 2022 – Friday 1<sup>st</sup> July 2022**

Dear Sir/Madam,

South Kesteven District Council are intending to submit an Annual Position Statement to the Planning Inspectorate by the deadline of 31 July 2021 in accordance with paragraph 75 of the National Planning Policy Framework, and the relevant National Planning Practice Guidance. The Annual Position Statement will set out the 5 year housing land position statement as at 1 April 2022, and will be prepared in consultation with developers, landowners and key stakeholders.

Site specific deliverability forms were distributed to Developers/Landowners/Agents for a two week consultation, seeking delivery information on all large sites and Local Plan allocations within the Council's housing supply for the Local Plan period up to 2036. The information received has been used to inform the Draft Annual Position Statement.

South Kesteven District Council are now writing to Developer/Landowners/Agents and others who have an impact on delivery, seeking views on the Draft Annual Position Statement and accompanying Statement of Engagement. The Draft Annual Position Statement and Statement of Engagement can be found on the Council's dedicated webpage via the following link

[www.southkesteven.gov.uk/APS](http://www.southkesteven.gov.uk/APS)

Please complete the attached response form and return to the Council. Any responses will be considered in the final Annual Position Statement, which the Council intends to submit to the Planning Inspectorate.

Please send completed forms to [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be sent to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ.

**Completed forms should be returned by 23:59pm on Friday 1<sup>st</sup> July 2022.**

Yours sincerely,

*S. Brannon*

**Shaza Brannon – Principal Planning Policy Officer**

The information contained in this e-mail along with any attachments may be confidential, legally privileged or otherwise protected from disclosure. It is intended for the named individual(s) or entity who is/are the only authorised recipient(s). If this message has reached you in error please notify the sender immediately and delete it without review. Email is not secure and may contain viruses. We make every effort to ensure email is sent without viruses, but cannot guarantee this and recommends recipients take appropriate precautions. We may monitor email traffic data and content in accordance with our policies and English law.

[Redacted]

[Redacted]

The views expressed in this email are those of the author and may not be official policy. Internet email should not be treated as a secure form of communication. Please notify the sender if received in error.

## **Disclaimer**

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council**  
**Draft Annual Position Statement Consultation Response Form**  
**Monday 6<sup>th</sup> June to 11.59pm Friday 1<sup>st</sup> July 2022**

**This form has three parts**

**Part A** is for your personal details.

**Part B** is your representation(s) on the Draft Annual Position Statement

**Part C** is your representation (s) on the accompanying Draft Statement of Engagement

**How to respond:**

Please fill in the response form for each section you wish to comment on. It is important that you state the paragraph number(s) and section(s) your representation relates to (e.g. 1.0 Introduction/ paragraph 1.1). This will enable us to process your comments efficiently and effectively.

Respond by returning forms by:

**Email:** to [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be sent to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ.

**The Deadline for responses is 11:59pm on Friday 1<sup>st</sup> July 2022**

All representations will be made publicly available and must be received by 11:59pm on Friday 1<sup>st</sup> July 2022.

## **Part A: Personal Details**

|               | 1. Personal Details  | 2. Agents Details (if Applicable) |
|---------------|--|-----------------------------------|
| Title         | Mrs  |                                   |
| First Name    | Hannah   |                                   |
| Last Name     | Guy  |                                   |
| Organisation  | Allison Homes  |                                   |
| Address       | ██████████<br>██████████<br>██████████<br>██████████<br>██████████ |                                   |
| Postcode      | ██████████   |                                   |
| Telephone     | ██████████   |                                   |
| Email Address | ██████████████████<br>██████████                                   |                                   |

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

|  |
|--|
| <b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b> |
|--|

|   |  |
|---|--|
| If you do not wish to be added or would like your details to be removed, then please select the following box |  |
|---|--|

### **4. Please Sign and date this form:**

| Signature (please type for an electronic response) | Date       |
|--|------------|
| ██████████   | 30/06/2022 |

## **Part B: Your Representation on the Draft Annual Position Statement**

**PLEASE USE ONE FORM FOR EACH REPRESENTATION**

|   |  |
|---|--|
| <b>5. To which Section(s) does your representation relate to?</b>   |  |
| <b>6. To which Paragraph(s) does your representation relate to?</b> |  |

### **7. Please set out your representation on the Annual Position Statement.**

Please be as precise as possible.

Whilst we are not objecting to the APS, we would like to raise a number of reservations that we have with regards to the sites that have been assessed and therefore make the following comments.

*APS002 S14/3097*

This site has appeared in the APS since 2020, with SKDC predicting the completion of the 87 units in 2022/2023 (APS 2020). This was the same in the APS 2021.

In the APS in 2021, the developer agreed that completions should start from 2021/22.

In the draft APS in 2022, completions have been pushed back and developer agrees that completions should be from 2023/2024. The same 87 units have appeared has in the 5 year period for the past 3 years, with no completions as of yet.

*APS003 S13/1931*

Legal issues on site causing pushback of site deliverability. Starting completions in 2023/24 but could be pushed back due to the aforementioned legal issues.

*APS025(N) S20/0368*

Previous APS from 2021 predicted 35 units in 2021/22 with completions doubling to 70 units in 2022/23. Developer stated a high rate of completion, hence the 70 units per annum, but have not met targets set. Actual completions in 2021/22 were 10 units. Very high target of 70 units per annum.

*APS029 S18/0937*

Inconsistent completions with 9 units completed in 2020/21 and 40 units completed in 2021/22.

*APS030 S18/1840*

63 units were meant to be built by 2022/23 (APS 2020), with this being echoed in the APS 2021, but with a high rate of completion. The 63 units are apparently under construction, with SKDC predicting a very high level of completion at 63 in a year.

ACR2229

**APS047 SKLP269**

Completions have been pushed back 2 years from APS 2020, with the inspectors report in 2021 removing 100 completions from the APS in 2021. Completions are at a very high rate of 75 units per year, increasing to 100 units per year in 2025/26.

ACR2230

**APS049 SKLP316**

The MOD won't release the barracks until 2028. Therefore, the 175 units that are being predicted to being completed won't be started before 2028.

ACR2231

**APS055 SKLP16**

The Landowner no longer wants to proceed with development.

ACR2232

**APS058 SKLP257, SKLP258, SKLP240**

Prediction of 170 units in the 5 year period. Site has no planning permission and due to the scale and size of the development, it is unlikely that a full application will be processed before the 5 year period. Furthermore, this site is only possible with the delivery of the link road through the Allison Homes site in Quarry Farm, based in the Rutland County Council planning authority area. Without this link road, the 170 units predicted cannot be relied upon. Allison Homes are looking forward to working with SKDC, RCC and the landowners/developers to agree a forward strategy and to ensure that delivery predictions can be obtained. This collaborative approach is considered necessary due to the cross boundary nature of the schemes, reliance on infrastructure off site to enable delivery of the 170 units in the calculations and RCC's current position regarding Allison Homes live application.

(Continue on a separate sheet/expand box if necessary).

|   |            |  |           |          |
|---|------------|--|-----------|----------|
| <b>8. Are you attaching any additional sheets that relate to this representation?</b> | <b>Yes</b> |  | <b>No</b> | <b>X</b> |
| <b>If yes, please indicate total additional sheets</b>                                |            |  |           |          |

|  |  |
|--|--|
|  |  |
|--|--|

**Part C: Your Representation on the Accompanying Statement of Engagement**

**PLEASE USE ONE FORM FOR EACH REPRESENTATION**

|  |  |
|--|--|
| <b>9. To which Section(s) does your representation relate to?</b>    |  |
| <b>10. To which Paragraph(s) does your representation relate to?</b> |  |

|  |
|--|
| <b>11. Please set out your representation on the Accompanying Statement of Engagement</b><br>Please be as precise as possible. |
|--|

|  |
|--|
|  |
|--|

(Continue on a separate sheet/expand box if necessary).

|  |            |  |           |          |
|--|------------|--|-----------|----------|
| <b>12. Are you attaching any additional sheets that relate to this representation?</b> | <b>Yes</b> |  | <b>No</b> | <b>X</b> |
| <b>If yes, please indicate total additional sheets</b>                                 |            |  |           |          |





SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council**  
**Draft Annual Position Statement Consultation Response Form**  
**Monday 6<sup>th</sup> June to 11.59pm Friday 1<sup>st</sup> July 2022**

**This form has three parts**

**Part A** is for your personal details.

**Part B** is your representation(s) on the Draft Annual Position Statement

**Part C** is your representation (s) on the accompanying Draft Statement of Engagement

**How to respond:**

Please fill in the response form for each section you wish to comment on. It is important that you state the paragraph number(s) and section(s) your representation relates to (e.g. 1.0 Introduction/ paragraph 1.1). This will enable us to process your comments efficiently and effectively.

Respond by returning forms by:



**Email:** to [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be sent to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ.

**The Deadline for responses is 11:59pm on Friday 1<sup>st</sup> July 2022**

All representations will be made publicly available and must be received by 11:59pm on Friday 1<sup>st</sup> July 2022.

## **Part A: Personal Details**

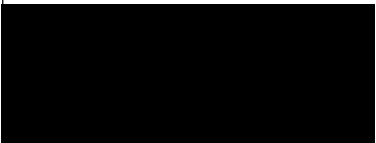
|               | 1. Personal Details                 | 2. Agents Details (if Applicable)  |
|---------------|-------------------------------------|--|
| Title         |                                     |  |
| First Name    |                                     | Liberty  |
| Last Name     |                                     | Stones   |
| Organisation  | Defence Infrastructure Organisation | Fisher German LLP  |
| Address       |                                     |    |
| Postcode      |                                     |   |
| Telephone     |                                     |  |
| Email Address |                                     |  |

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

### **3. If you are not already on our consultation database and you respond your details will automatically be added to the database**

If you do not wish to be added or would like your details to be removed, then please select the following box

### **4. Please Sign and date this form:**

| Signature (please type for an electronic response)                                  | Date       |
|---|------------|
|  | 01.07.2022 |

## **Part B: Your Representation on the Draft Annual Position Statement**

**PLEASE USE ONE FORM FOR EACH REPRESENTATION**

|   |                                       |
|---|---------------------------------------|
| <b>5. To which Section(s) does your representation relate to?</b>   | Appendix 9 – Trajectory (2011 - 2036) |
| <b>6. To which Paragraph(s) does your representation relate to?</b> | GR3-H4, Prince William of Gloucester  |

### **7. Please set out your representation on the Annual Position Statement.**

Please be as precise as possible.

The DIO support the Council's Draft Annual Position Statement 2022 (June 2022), and the proposed build out rates been assumed for Local Plan Allocation GR3-H4, Prince William of Gloucester Barracks. The build out rates reflect the data DIO provided the Council in April 2022.

DIO is committed to the delivery of homes at Prince William of Gloucester Barracks and is working with the Council to bring forward the site in line with the trajectory set out in the Draft Annual Position Statement. DIO are currently working up an outline planning application for the site to submit as soon as possible and will commence regular Stakeholder meetings with the Authority and other stakeholders within the next couple of months.

(Continue on a separate sheet/expand box if necessary).

|   |            |                          |           |                                     |
|---|------------|--------------------------|-----------|-------------------------------------|
| <b>8. Are you attaching any additional sheets that relate to this representation?</b> | <b>Yes</b> | <input type="checkbox"/> | <b>No</b> | <input checked="" type="checkbox"/> |
| <b>If yes, please indicate total additional sheets</b>                                |            |                          |           |                                     |

**Part C: Your Representation on the Accompanying Statement of Engagement**

**PLEASE USE ONE FORM FOR EACH REPRESENTATION**

|  |  |
|--|--|
| <b>9. To which Section(s) does your representation relate to?</b>    |  |
| <b>10. To which Paragraph(s) does your representation relate to?</b> |  |

**11. Please set out your representation on the Accompanying Statement of Engagement**

Please be as precise as possible.

|  |
|--|
|  |
|--|

(Continue on a separate sheet/expand box if necessary).

|  |            |  |           |  |
|--|------------|--|-----------|--|
| <b>12. Are you attaching any additional sheets that relate to this representation?</b> | <b>Yes</b> |  | <b>No</b> |  |
| <b>If yes, please indicate total additional sheets</b>                                 |            |  |           |  |

30<sup>th</sup> June 2022

By email: [Planningpolicy@southkesteven.gov.uk](mailto:Planningpolicy@southkesteven.gov.uk)

Planning Policy  
South Kesteven District Council  
Council Offices  
St Peters Hill  
Grantham  
Lincolnshire  
NG316PZ

Dear Sirs

**SOUTH KESTEVEN DRAFT ANNUAL POSITION STATEMENT CONSULTATION - DEFENCE INFRASTRUCTURE ORGANISATION (DIO) RESPONSE**

I am writing on behalf of the Defence Infrastructure Organisation (DIO) in respect of its land interests at Prince William of Gloucester Barracks; Local Plan Allocation GR3-H4.

The DIO support the Council's Draft Annual Position Statement 2022 (June 2022), and the proposed build out rates been assumed for Local Plan Allocation GR3-H4, Prince William of Gloucester Barracks. The build out rates reflect the data DIO provided the Council in April 2022.

DIO is committed to the delivery of homes at Prince William of Gloucester Barracks and is working with the Council to bring forward the site in line with the trajectory set out in the Draft Annual Position Statement. DIO are currently working up an outline planning application for the site to submit as soon as possible and will commence regular Stakeholder meetings with the Authority and other stakeholders within the next couple of months.

Yours sincerely  
For and on behalf of Fisher German LLP

[Redacted Signature]

Liberty Stones BA (Hons) Dip TP MRTPI

[Redacted]